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Attorneys for Plaintiffs ALLY BANK, WESLEY W.
HALIHAN and GINA HALIHAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ALLY BANK, WESLEY W. HALIHAN
and GINA HALIHAN,

Plaintiffs,

vs.

WELLS FARGO BANK, N.A., and
DOES 1 through 10,

Defendants.

No. C-11-00896 SC

STIPULATION AND ~~[PROPOSED]~~
ORDER FOR LEAVE TO FILE FIRST
AMENDED COMPLAINT

STIPULATION

IT IS HEREBY STIPULATED by and between the parties hereto, through their respective counsel, that this court may allow Plaintiffs ALLY BANK, WESLEY W. HALIHAN, and GINA HALIHAN ("Plaintiffs") to file a first amended complaint, a copy of which is attached hereto as Exhibit "A", adding new plaintiffs, adding additional persons and entities as defendants and adding causes of action against the newly named defendants pursuant to information obtained by plaintiffs evidencing that the newly named defendants engaged in a common scheme to defraud numerous sellers and buyers of real property and some of their agents and lenders out of over one

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1 million seven hundred thousand dollars (\$1,700,000) through phantom sales, sham loans and the
2 execution of fraudulent reconveyances of deeds of trust.

3
4 Dated: August 4, 2011

**ANGLIN, FLEWELLING, RASMUSSEN,
CAMPBELL & TRYTTEN LLP**

5
6 /s/ Matthew J. Pero
7 MATTHEW J. PERO
8 Attorneys for Defendant, Wells Fargo Bank, N.A.

9
10 Dated: August 4, 2011

**SHAPIRO BUCHMAN PROVINE BROTHERS
SMITH LLP**

11
12 /s/ Stephen C. Seto
13 STEPHEN C. SETO
14 Attorneys for Plaintiffs ALLY BANK, WESLEY W.
15 HALIHAN and GINA HALIHAN

16
17 **ORDER**

18 PURSUANT TO THE FOREGOING STIPULATION, IT IS SO ORDERED that
19 Plaintiffs ALLY BANK, WESLEY W. HALIHAN, and GINA HALIHAN ("Plaintiffs") are
20 hereby allowed to file the within proposed first amended complaint.

21 Dated: August 8, 2011

22 SAMUEL CONTI
23 Judge of the District Court

